

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

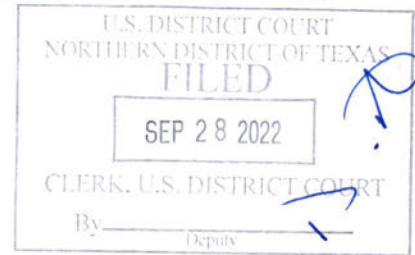
United States of America

v.

Case No.

2:22-MJ-179

Everett Wayne Copelin, III

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 21-September 25, 2022 in the county of Randall in the
Northern District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 18, United States Code, Section 875(c)	Interstate Threatening Communications
Title 18, United States Code, Section 115(a)(1)(B)	Threatening a Federal Officer

This criminal complaint is based on these facts:

see attached affidavit in support of complaint.

☒ Continued on the attached sheet.

A handwritten signature in blue ink, appearing to read "David Bolyard".

Complainant's signature

David Bolyard, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

9/28/22

A handwritten signature in blue ink, appearing to read "Lee Ann Reno".

Judge's signature

City and state:

Amarillo, Texas

Lee Ann Reno, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, David Lee Bolyard, being duly sworn, hereby depose and state the following:

Affiant's Background and Experience

I have been a Special Agent with the FBI since 2019, and am currently assigned to the Dallas Field Division, Amarillo Resident Office. During this time, I have investigated numerous federal violations. I have received training and have experience in interviewing and interrogation techniques, arrest procedures, search and seizure, search warrant applications and various other investigative techniques.

The information contained in this affidavit is based upon my personal experience and information relayed to me by other law enforcement officers involved in this investigation. Because this affidavit is submitted for the limited purpose of establishing probable cause to believe a crime has been committed and that the defendant committed it, I have not included each and every fact known to me in this affidavit.

Title 18, United States Code, Section 875(c)

Title 18, United States Code, Section 875(c), makes it a crime for anyone to send or transmit a threat to injure the person of another in interstate or foreign commerce. There are three elements of this offense:

First: That the defendant knowingly sent or transmitted a communication containing a threat to injure the person of another, as charged;

Second: the defendant transmitted the communication either with the purpose of issuing a true threat or with knowledge that the communication would be understood as a true threat, as defined in these instructions; and

Third: That the communication was sent in interstate or foreign commerce.

A “threat” is a serious statement expressing an intent to injure any person, which under the circumstances would cause apprehension in a reasonable person, as distinguished from mere idle or careless talk, exaggeration, or something said in a joking manner.

Postings on Gab are sent in interstate or foreign commerce because transmitting messages by means of the Internet is tantamount to moving messages across state lines and thus constitutes transportation in interstate commerce. *Cf. United States v. Runyan*, 290 F.3d 223, 239 (5th Cir. 2002) (holding that use of Internet, in and of itself, constitutes interstate transportation sufficient to satisfy the interstate commerce element of 18 U.S.C. § 2251); *see United States v. Elonis*, 897 F. Supp.2d 335, 343-44 (E.D. Pa. 2012), *overruled on other grounds by Elonis v. United States*, 575 U.S. 723 (2015) (holding same in the context of 18 U.S.C. § 875(c)).

Title 18, United States Code, Section 115(a)(1)(B)

Title 18, United States Code, Section 115(a)(1)(B), makes it a crime for anyone to threaten a federal officer. There are three elements of this offense:

First: That the defendant threatened to assault, kidnap, or murder a person, as charged;

Second: That the person was a United States official, a United States judge, a Federal law enforcement officer, or an official whose killing would be a crime under section 1114; and

Third: That the threat was made with intent to impede, intimidate, or interfere with such official, judge, or law enforcement officer while engaged in the performance of official duties, or with intent to retaliate against such official, judge, or law enforcement officer on account of the performance of official duties.

A special agent of the Federal Bureau of Investigation is a “Federal law enforcement officer” for purposes of this statute.

Facts Establishing Probable Cause

On September 4, 2022, the FBI National Threat Operations Center received information that a Gab account with user name "Amalek_4_Life" and display name “ALPHA TOP DOG PURE BLOOD” posted a threatening statement on Gab directed at law enforcement officers. On August 31, 2022, “Amalek_4_Life” posted, “I don’t care if I die because I’m going kamikaze bitches and you house hoe pasty white law-enforcement bitches won’t know what hit you because I know you ain’t ready to die like me!”

Gab is a social networking platform. According to a description provided on its website, Gab.com, Gab is “[a] social network that champions free speech, individual liberty and the free flow of information online.”

Through its investigation, the FBI identified “Amalek_4_Life” as Everett Wayne Copelin, III, a/k/a Rhett Copelin.

On September 4, 2022, the FBI issued an Emergency Disclosure Request (EDR) to Gab regarding the “Amalek_4_Life” Gab account. In response to the EDR, Gab provided the subscriber information regarding the user’s email address, which was identified as alphadogrhettl@gmail.com. The Gab account was created on March 11, 2021.

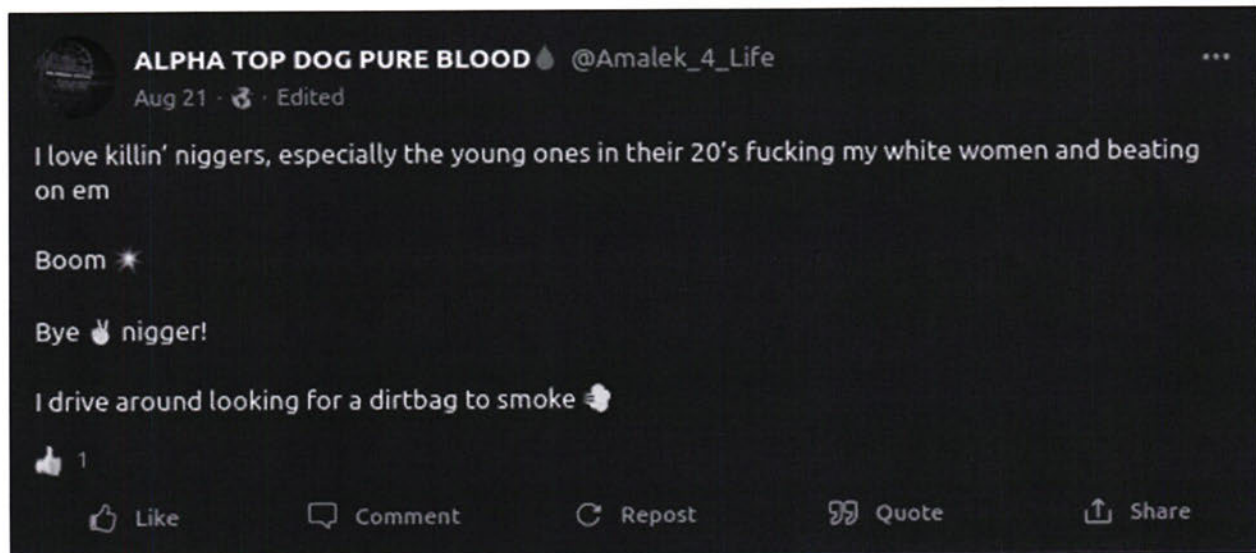
On September 4, 2022, the FBI issued an EDR to Google regarding email address alphadogrhettl@gmail.com. In response to the EDR, Google provided the subscriber information, which included the user’s phone number, which was identified as +[REDACTED]

The FBI conducted public database queries for telephone number [REDACTED]. Multiple databases returned information that Copelin was associated with [REDACTED]. Copelin’s Texas driver’s license shows his physical and mailing address as [REDACTED] Amarillo, Texas 79118.

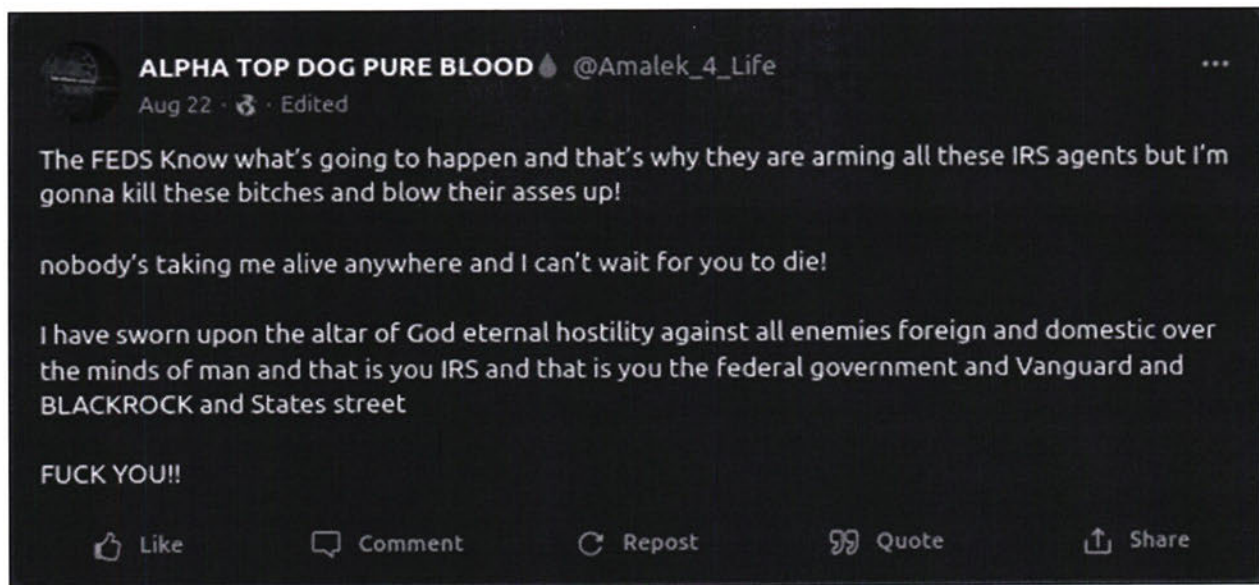
The FBI conducted checks of Copelin’s criminal history. His criminal history included multiple incidents of threatening behavior. In May 2016, Copelin was arrested and charged in Hot Springs, North Carolina, after he pointed a 6-to-8 inch knife at a police officer and said: “I’m going to fuck you up.” In January 2006, Copelin was arrested and charged in Sugar Land, Texas, after he allegedly threatened two individuals with a machete and a knife and stole money from one of them. In June 2004, Copelin was arrested and charged in Sugar Land, Texas, after allegedly breaking into a residence and attempting to steal a firearm. Copelin was not convicted of any of these offenses.

A review of Copelin's Gab account revealed a long history of posts containing threatening statements against a variety of targets, including law enforcement officers, government officials, Jews, Mexicans, Blacks, Muslims, and others. Some of Copelin's recent threatening posts are included below.

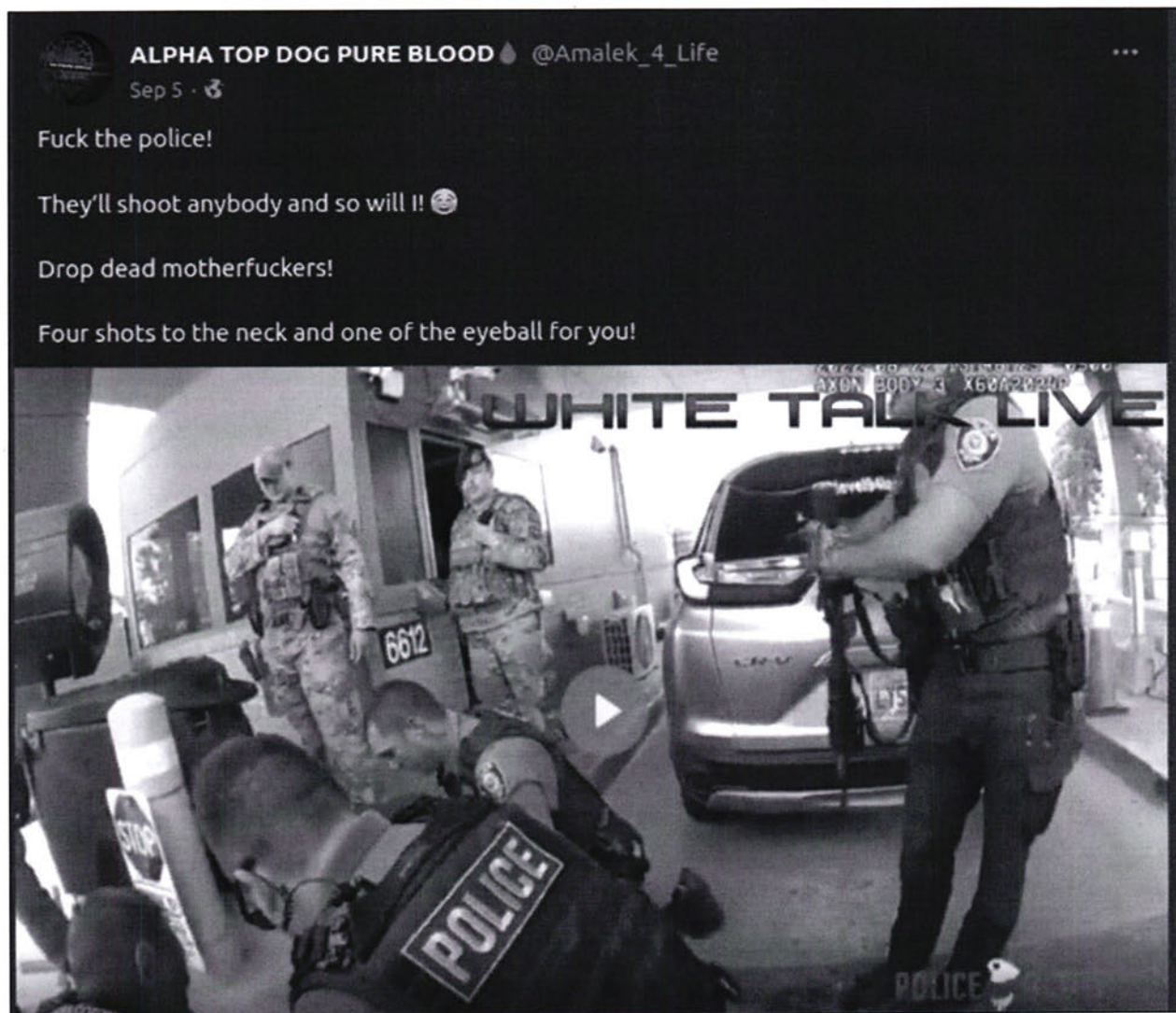
In a post on August 21, 2022, Copelin wrote, "I love killin' niggers, especially the young ones in their 20's fucking my white women and beating on em Boom Bye nigger! I drive around looking for a dirtbag to smoke"



In a post on August 22, 2022, Copelin wrote, "The FEDS Know what's going to happen and that's why they are arming all these IRS agents but I'm gonna kill these bitches and blow their asses up! nobody's taking me alive anywhere and I can't wait for you to die! I have sworn upon the altar of God eternal hostility against all enemies foreign and domestic over the minds of man and that is you IRS and that is you the federal government and Vanguard and BLACKROCK and States street FUCK YOU!!"



In a post on September 5, 2022, Copelin wrote, "Fuck the police! They'll shoot anybody and so will I! Drop dead motherfuckers! Four shots to the neck and one of the eyeball for you!"



In a post on September 8, 2022, Copelin wrote, “I’ll go down to the border personally today and start shooting invaders with joy and honor but my fat bitch ass pasty white elders should be doing it but they’re shit so maybe I will and then I’ll blow these FEDS away too! They’re letting them in here with the Jews at the state department that all need to hang as well! They need to die and lay on the ground. No burials”

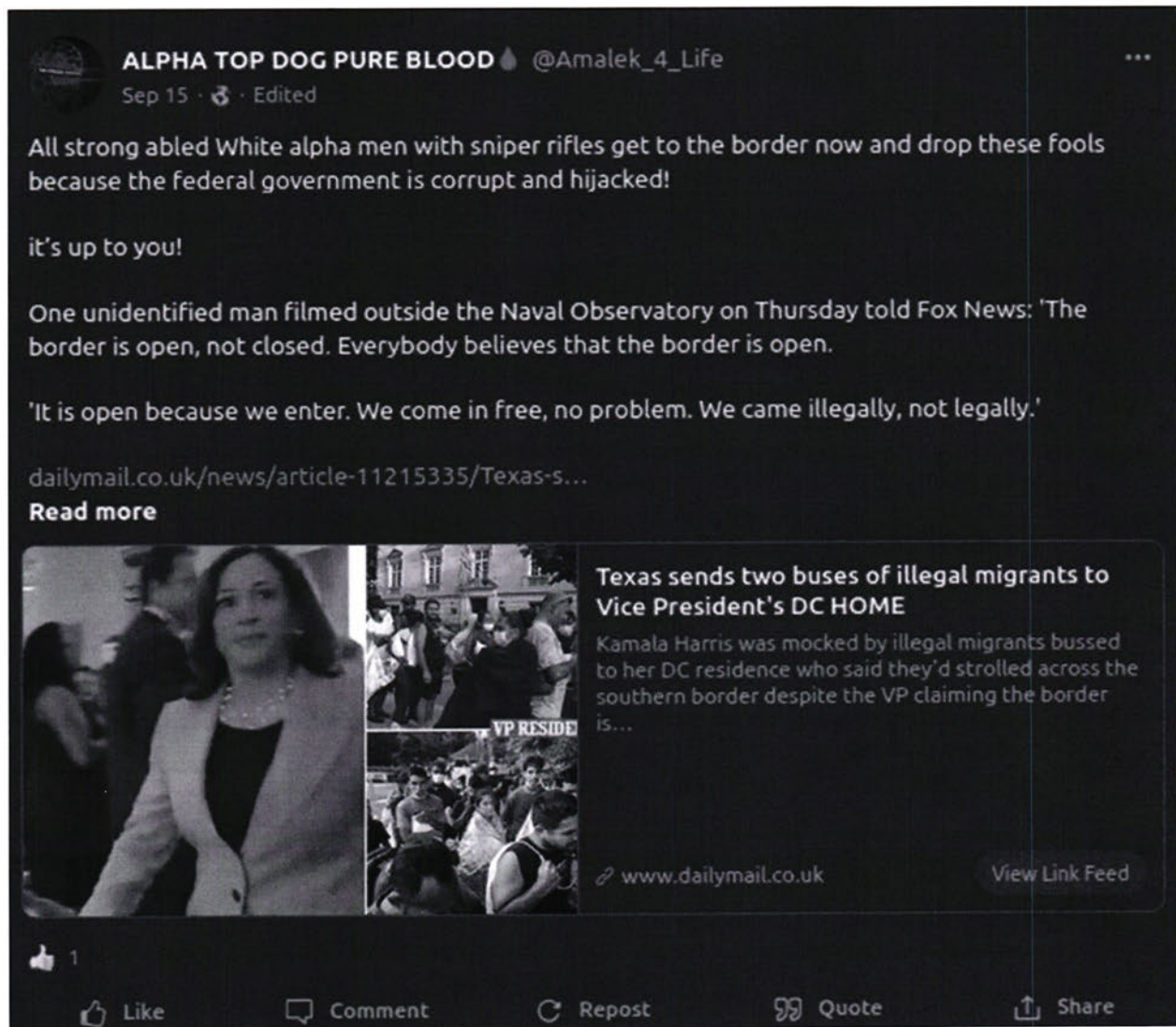


In a post on September 14, 2022, Copelin wrote, "These Mexicans and their kids are getting way too Uppity And they shouldn't even be here but I'll shoot em in the neck just the same Can't wait for this race war and these fuckers to set us up! The cops are in on it and they protect Mexicans but they'll drop just the same"

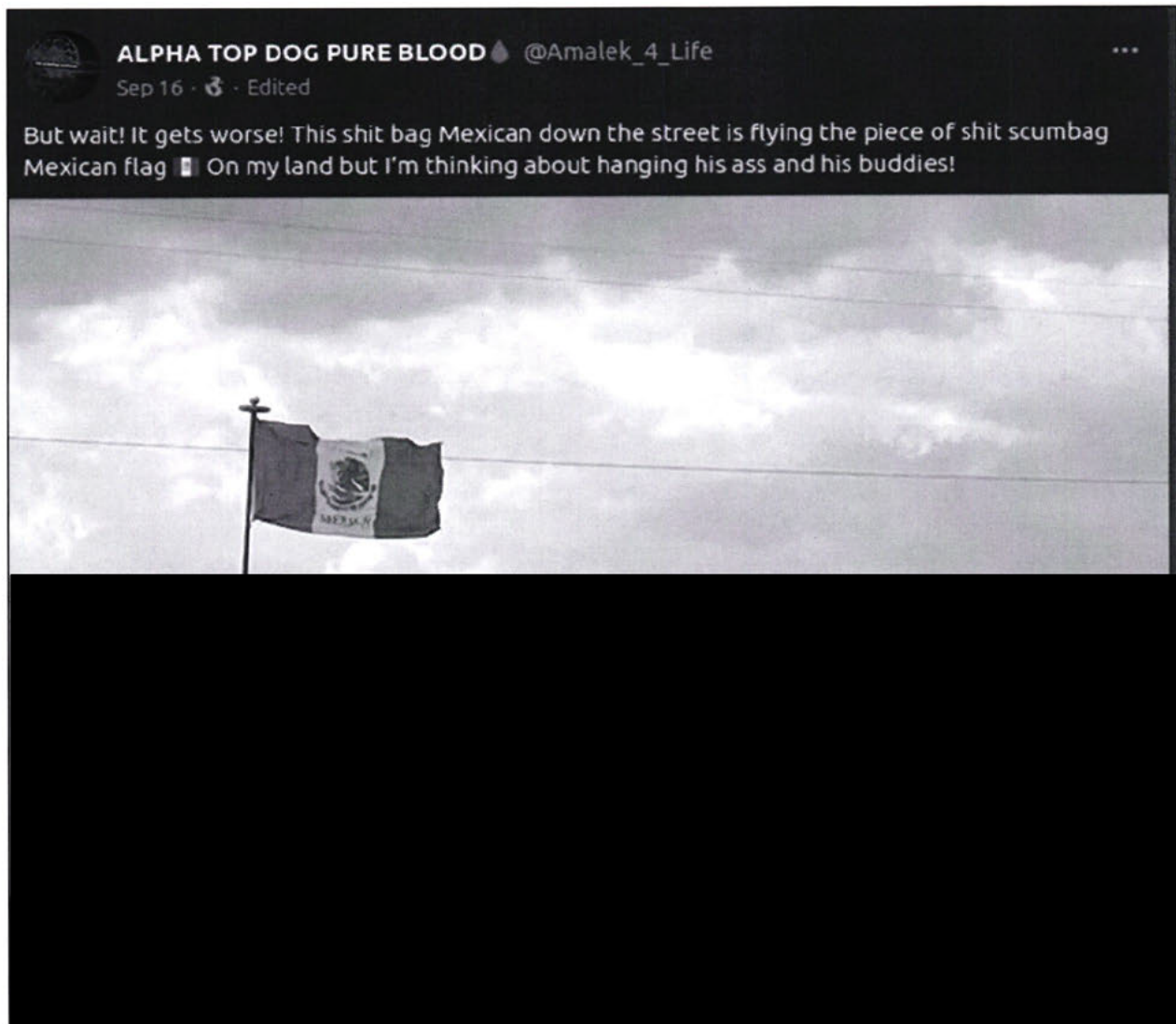


In a post on September 15, 2022, Copelin wrote, "All strong abled White alpha men with sniper rifles get to the border now and drop these fools because the federal government is corrupt and hijacked! it's up to you! One unidentified man filmed outside the Naval Observatory on Thursday told Fox News: 'The border is

open, not closed. Everybody believes that the border is open. 'It is open because we enter. We come in free, no problem. We came illegally, not legally.'"



In a post on September 16, 2022, Copelin wrote, "But wait! It gets worse! This shit bag Mexican down the street is flying the piece of shit scumbag Mexican flag On my land but I'm thinking about hanging his ass and his buddies!"



In a post on September 25, 2022, Copelin wrote, “Anybody with a BETO sticker or sign is Texas is getting it and I’ll hang you on a light pole at dusk.”



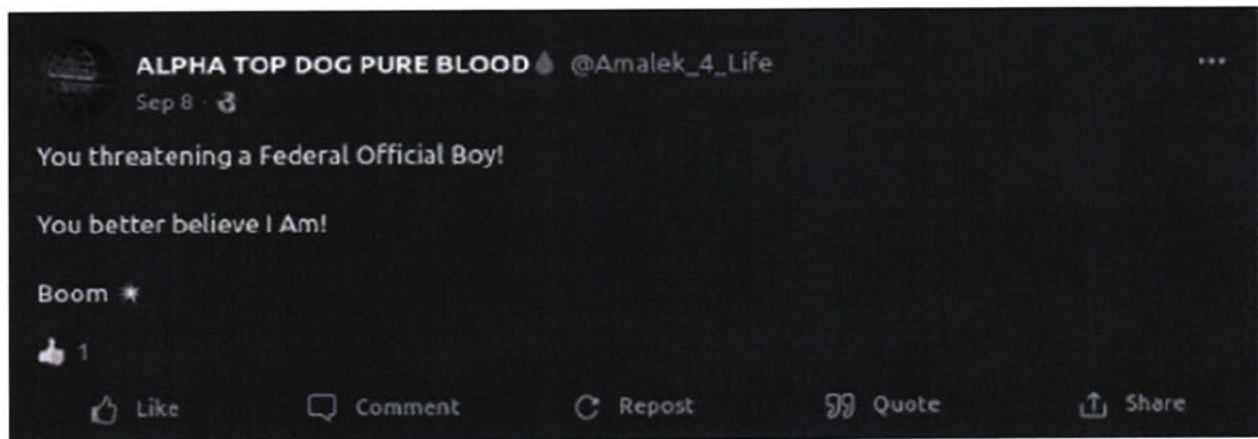
The FBI Houston office interviewed a Source of Information (SOI) who knew Copelin. The SOI confirmed that Copelin resided at [REDACTED] in

Amarillo, Texas. Additionally, Copelin's post with a photograph of a Mexican flag is close to [REDACTED] which likewise confirms that is his residence.

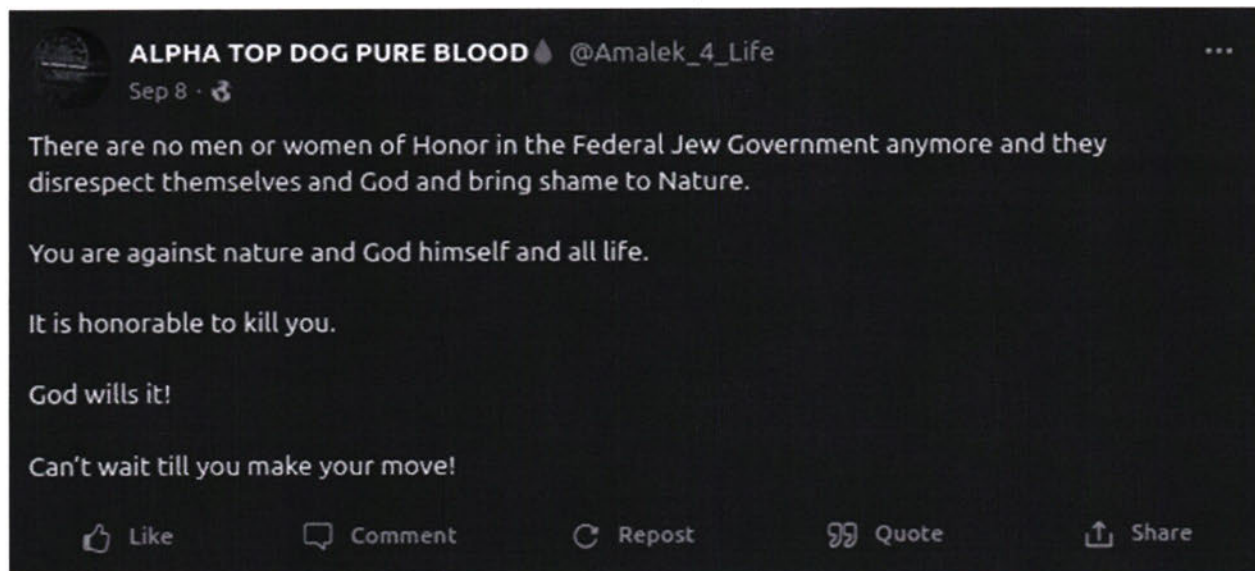
The SOI stated that Copelin has a 9mm pistol.

On September 14, 2022, the FBI received information that on September 8, 2022, Copelin found out his posts on Gab had been reported to the FBI.

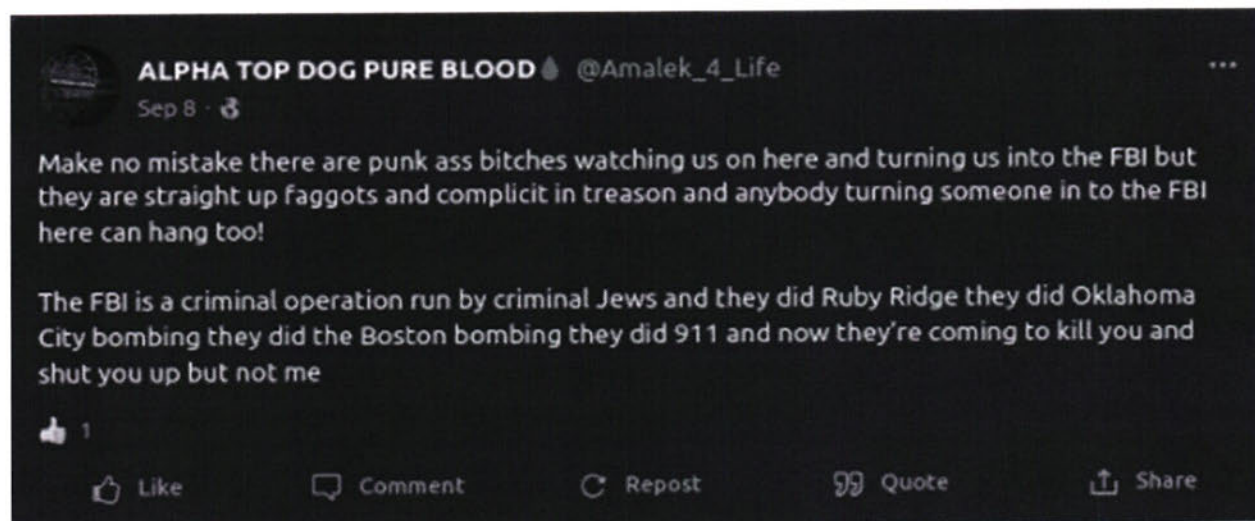
In a post on September 8, 2022, Copelin wrote, "You threatening a Federal Official Boy! You better believe I Am! Boom"



In another post on September 8, 2022, Copelin wrote, "There are no men or women of Honor in the Federal Jew Government anymore and they disrespect themselves and God and bring shame to Nature. You are against nature and God himself and all life. It is honorable to kill you. God wills it! Can't wait till you make your move!"



In another post on September 8, 2022, Copelin wrote, "Make no mistake there are punk ass bitches watching us on here and turning us into the FBI but they are straight up faggots and complicit in treason and anybody turning someone in to the FBI here can hang too! The FBI is a criminal operation run by criminal Jews and they did Ruby Ridge they did Oklahoma City bombing they did the Boston bombing they did 911 and now they're coming to kill you and shut you up but not me"

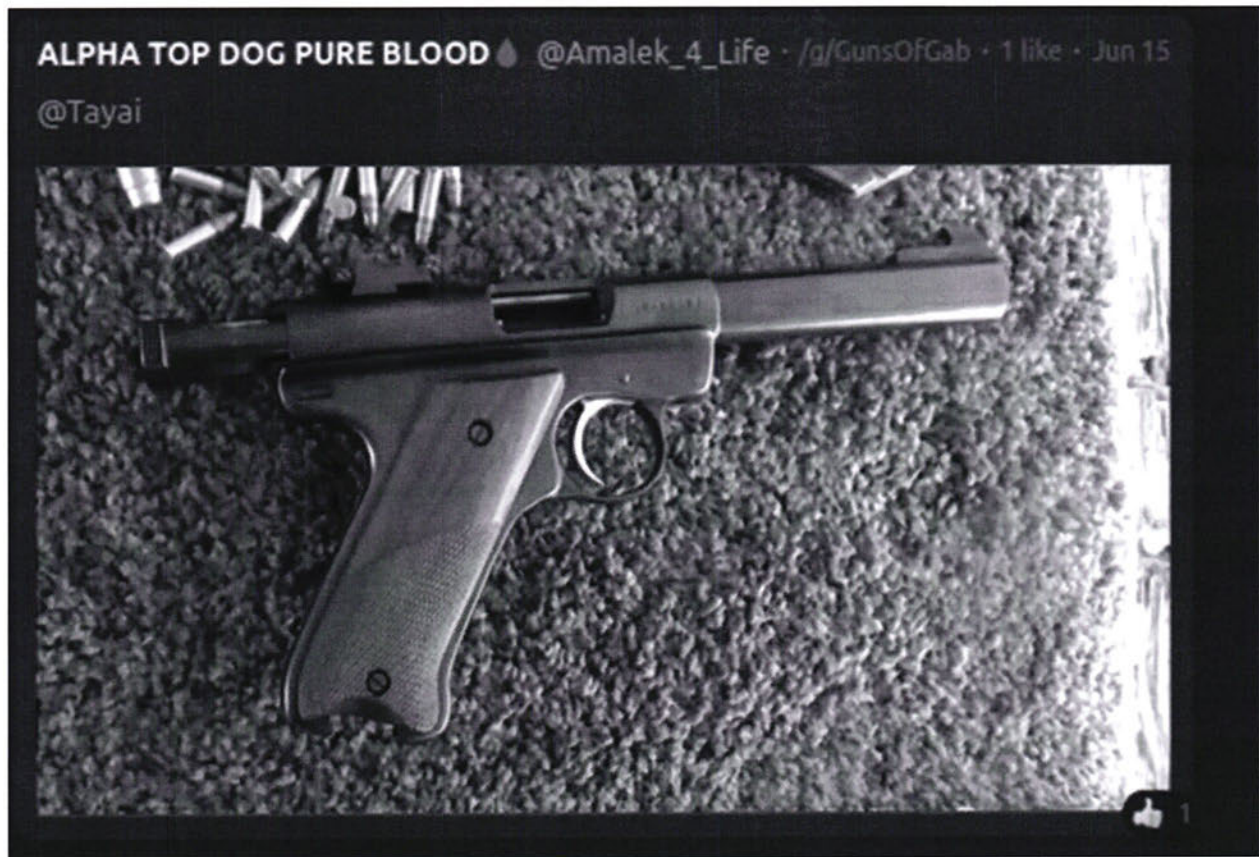


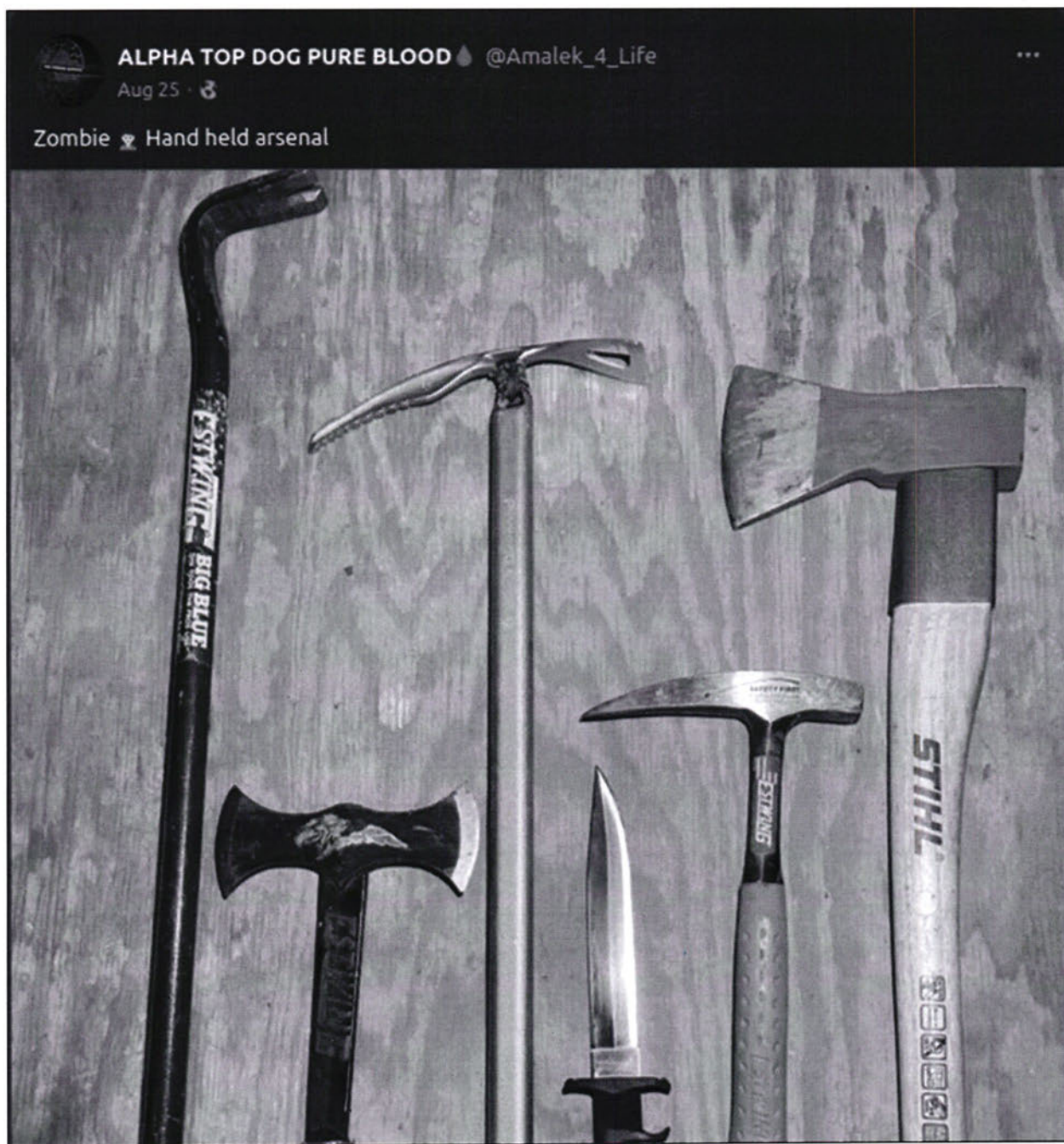
In another post on September 8, 2022, Copelin wrote, “The fbi wants to look for you and do a meet and greet say fuck that and say nothing They were looking for me bc some faggot bitch on here is turning people in to the criminal Jews at the fbi and they need to hang tonight”



Based upon the timing and content of these posts, I have probable cause to believe that Copelin violated Title 18, United States Code, Section 115(a)(1)(B), by threatening to assault or murder FBI agents and did so with the intent to impede, intimidate, or interfere with FBI agents while engaged in the performance of their official duties, that is, investigating Copelin’s threatening posts on Gab.

In addition to posting threatening statements, Copelin has also posted photos of weapons, including a firearm and bladed weapons. These posts are included below.





Based on my training, education, and experience, and the information provided to me, I have probable cause to believe that Copelin violated Title 18, United State Code, Section 875(c), by transmitting a threat to injure the person of another in interstate and foreign commerce. Based on my training, education, and experience, and the information

provided to me, I also have probable cause to believe that Everett Wayne Copelin, III, violated Title 18, United State Code, Section 115(a)(1)(B), by threatening to assault and murder FBI agents with the intent to impede, intimidate, or interfere with FBI agents while investigating Copelin's threatening posts on Gab.



David Bolyard
Federal Bureau of Investigation

Subscribed and sworn to before me this 28th day of September 2022.



LEE ANN RENO
UNITED STATES MAGISTRATE JUDGE